

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2020

Docket No. ACR2020

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-17 OF CHAIRMAN'S INFORMATION REQUEST NO. 24

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 24, issued on March 11, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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1. In the *FY 2020 Annual Report*, the Postal Service states that it missed its Deliveries per Total Workhours, Percent Change (DPTWH % Change) target “due to overrunning the work hour plan.” *FY 2020 Annual Report* at 52. Subsequently, in Response to CHIR 15, the Postal Service states that it “is committed to matching workhours to workloads across all functions.”¹ Please explain in detail how the Postal Service will match workhours to workloads across all functions in FY 2021. In the response, please describe the specific methods and initiatives that the Postal Service will implement to match workhours to workloads in FY 2021 and future years.

RESPONSE:

The Postal Service undergoes regular efforts to minimize the number of unearned work hours and to optimize the level of necessary overtime used, including penalty overtime. For example, in establishing schedules for the employees, thousands of managers and/or supervisors in mail processing or delivery facilities take into account the hours that they anticipate will be necessary to perform all mail processing and/or delivery functions in deciding the number of hours and numbers of employees to be scheduled throughout the week and attempt to optimize the level of overtime that may be needed due to mail volume and employees' prescheduled absences. When, as often happens, circumstances such as an unanticipated increase in mail volume or unscheduled employee absences arise, management requests and/or approves overtime necessary to ensure timely delivery of mail.

¹ Responses of the United States Postal Service to Questions 1-11 of Chairman's Information Request No. 15, February 18, 2021, question 1.b. (Response to CHIR No. 15).

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In addition, the managers in the regions, divisions, districts, and facilities develop or renew and implement initiatives designed to minimize unearned work hours on an annual basis. For example, each fiscal year, the Postal Service prepares an Integrated Financial Plan (IFP). The IFP is a consolidation of all financial plans for the organization, including each of the Postal Service's over 30,000 postal facilities. The cost of labor, i.e., work hours, for field operations is the largest expense component in the plan, and of that, the largest component is for craft employees—those employees (e.g., letter carriers, mail handlers and clerks) who collect, process, distribute, and deliver mail to customers. Work hours are budgeted based on a number of factors, such as the state of the economy, labor-saving automated processing equipment purchases and other efficiency improvement initiatives, and most critically in recent years, the volume of mail and packages for each of the various mail classifications. Based on these factors, work hour requirements have dropped in recent years. For example, since 2006, total work hours have declined over 284 million, or an average of over 20 million per year.

Additionally, each Fiscal Year the Postal Service develops various initiatives for each of its Operations functions as part of an annual interactive process wherein Operations executives work together to develop tactics to increase efficiencies and reduce costs, consistent with service standards. Headquarters and area management have ongoing informal and formal discussions throughout every year to discuss ongoing or proposed initiatives for achieving savings and improving efficiency. Some initiatives

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focus on efforts to minimize the number of unearned work hours, or unproductive hours spent during the workday; their intended effect is to enhance efficiency while meeting service levels and/or to improve service.

Specific examples would include the extension of letter processing equipment output bins to permit additional sortation on a single piece of mail processing equipment. In FY 2020, Processing Operations expanded 382 letter sorting machines up to 302 output bins. Prior to expansion, the machines had as few as 206 output bins. The additional capacity makes possible a reduction in the number of individual sort programs while enabling a significant increase in size; and this in turn increases the volume of mail per sort plan, thereby reducing the number of times a machine has to be reset between sort plans and eliminating downtime.

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2. Please see the Postal Service's Response to CHIR No. 15, question 9, in which the Postal Service states that it will continue to report data for the following performance indicators: Single-Piece First-Class Mail, Presorted First-Class Mail, First-Class Mail Letter and Flat Composite, and Marketing Mail and Periodicals Composite. Please confirm that the FY 2021 Annual Performance Report and FY 2022 Annual Performance Plan will continue disaggregating targets and results for the Single-Piece First-Class Mail performance indicator by 2-Day and 3-5 Day, and the Presorted First-Class Mail performance indicator by Overnight, 2-Day, and 3-5 Day. If not confirmed, please explain why not and explain how targets and results will be disaggregated in future years.

RESPONSE:

No plans currently exist to cease reporting the disaggregated indicators in the FY 2021 Annual Performance Report or FY 2022 Annual Performance Plan.

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3. The following requests relate to the First-In-, First-Out (FIFO) method of mail management.
- a. Please describe the Postal Service's efforts, on both a local and national level, in FY 2020 to ensure that the FIFO method of mail management was followed. In the response, please explain whether and how these efforts were effective.
 - b. Please identify significant obstacles faced by the Postal Service that have historically prevented mail from being processed in FIFO order.
 - c. Please describe how the COVID-19 pandemic impacted the Postal Service's ability to process mail in FIFO order.
 - d. Please describe how the increase in package volume in FY 2020 and FY 2021 impacted the Postal Service's ability to process mail in FIFO order.

RESPONSE:

a. The Postal Service promotes the FIFO method of mail management by tasking sites with creating and maintaining one-way staging lanes (i.e., "swim" lanes). Standard work instructions are posted on the Postal Service intranet, and the finished product is inspected via Lean Mail Processing audits. The standard work instructions stipulate that mail be placed in the swim lane from the back and pushed forward as new containers arrive. This ensures that the oldest containers are first in line to be processed. In addition, the Postal Service uses color coding for Marketing Mail as a tool of visual management to ensure the oldest containers are processed first.

While the Postal Service strives to maintain FIFO order, sometimes it is not feasible due to facility constraints. Swim lanes require an aisle on either side, and some sites do not have enough space to accomplish this. In addition, efforts to maintain FIFO

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order can be hampered by the total volume of mail in a building. If the volume is such that the swim lanes are completely full, containers must be staged anywhere a place can be found, and FIFO order may be sacrificed.

b. As stated above, lack of space is the most significant obstacle that has historically prevented mail from being processed in FIFO order. This can be due to perennial facility constraints or to above average volumes.

c. The COVID-19 pandemic led to an unprecedented increase in package volume. Sites contended with the surge in volume while being able to use only their existing space. The increase in total containers made it more difficult to maintain FIFO order because swim lanes filled up, and mail had to be staged wherever a place could be found.

d. Please refer to the response above.

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- 4.** Please describe the actions that the Postal Service intends to take in FY 2021 to ensure that the FIFO method of mail management is followed. In the response, please explain how these actions will impact FY 2021 High-Quality Service results.

RESPONSE:

The Postal Service intends to reinforce its existing standard work instructions in FY 2021 to ensure that the FIFO method of mail management is followed. The Postal Service will continue to monitor this via Continuous Improvement, service improvement teams, and Lean Mail Processing. Failure to process mail in FIFO order can lead to service failures.

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5. The Postal Service states that, in the first half of FY 2020, several High-Quality Service performance indicators “achieved notable service improvements compared to the same period last year.” *FY 2020 Annual Report* at 35. Please provide High-Quality Service results for each performance indicator in FY 2019, disaggregated by quarter.

RESPONSE:

Corporate Performance Outcome	Measure	FY19Q1	FY19Q2	FY19Q3	FY19Q4
High-Quality Service	Single-Piece First-Class Mail				
	Two-Day	89.53%	91.55%	93.90%	93.97%
	Three-to-Five-Day	72.11%	79.67%	86.55%	87.78%
	Presort First-Class Mail				
	Overnight	94.68%	94.80%	96.30%	96.20%
	Two-Day	92.79%	93.30%	95.25%	95.27%
	Three-to-Five-Day	89.90%	90.43%	93.61%	94.10%
	First-Class Mail Letter & Flat (FCLF) Composite	88.47%	90.33%	93.38%	93.76%
	Marketing Mail & Periodical Composite	84.57%	88.21%	90.93%	91.79%

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6. In the *Analysis of the Postal Service's FY 2019 Annual Performance Report and FY 2020 Performance Plan*, the Commission stated that the Postal Service should develop service performance targets that "take into account operational realities such as the foreseeable occurrence of a number of severe weather events and natural disasters in any given year."²
- a. Please describe in detail whether and how the Postal Service accounted for severe weather events, natural disasters, and other network disruptions in its FY 2020 service performance targets. If the FY 2020 targets do not account for such disruptions, please explain why not.
 - b. Please describe in detail whether and how the Postal Service will account for severe weather events, natural disasters, and other network disruptions in its FY 2021 service performance targets. If the FY 2021 targets will not account for such disruptions, please explain why not.

RESPONSE:

a. By their nature, weather, natural disasters, and network disruptions are unplanned events. The number, severity, geography, and impact vary greatly from event to event; therefore, the impact will vary as well. Because of the unplanned nature of these events, service targets for FY 2020 do not factor in these unknowns. Furthermore, the Postal Service has had a history of establishing aggressive "stretch" targets, which have not taken impact events into account. FY 2020 service targets aligned with previously established targets, closely matching previous targets for FY 2019 and prior years.

² Docket No. ACR2019, Postal Regulatory Commission, *Analysis of the Postal Service's FY 2019 Annual Performance Report and FY 2020 Performance Plan*, June 1, 2020, at 30 (FY 2019 Analysis).

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b. Unlike in previous years, service targets were not fully established prior to the beginning of this fiscal year. Service targets for FY 2021 remain under development. Because the process has the advantage of timing and hindsight, actual performance and disruptions will be included in the target setting. Targets are being developed to be attainable under current conditions and circumstances. Events such as natural disasters, weather impacts, and the ongoing COVID-19 pandemic are evaluated and considered while targets are established.

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7. Please identify the five most frequently identified root causes of service failures in the First Mile, Transit, and Last Mile phases, across all of the Postal Service's Market Dominant products (*i.e.*, not disaggregated by product, class, or service standard), in FY 2020.

RESPONSE:

There are no subcategories of root causes for First Mile and Last Mile, but there are four subcategories for Transit failures. The definitions for each of these root causes are listed below:

Root Cause Name	Commercial Mail Requirement	Single Piece First Class Mail Requirement
First Mile Failure	First scan at origin occurs after Start-The-Clock + 1 @ 1200 (possibly called origin delay - entry to first processing)	All pieces that passed Last Mile + Processing, but failed Overall
Transit Late Destination Primary Scan	The Last outgoing scan (any type origin facility) is on time (before or = 0030 on Start-The-Clock Date + 1) and the First Incoming Primary scan (at expected destination facility) is late (after 1500 on Expected Delivery Date - 1)	The Last outgoing scan (any type origin facility) is on time (before or = 0030 on Start-The-Clock Date + 1) and the First Incoming Primary scan (at expected destination facility) is late (after 1500 on Expected Delivery Date - 1)
Transit Missing Destination Primary Scans	The Last outgoing scan (any type at origin facility) is on time (before or = 0030 on Start-The-Clock Date + 1) and there are no Incoming Primary scans (at expected destination facility)	The Last outgoing scan (any type at origin facility) is on time (before or = 0030 on Start-The-Clock Date + 1) and there are no Incoming Primary scans (at expected destination facility)
Transit Missing Outgoing Scan	There is no outgoing scan (any type, at origin facility) and the First incoming Primary (at expected destination facility) scan is late (after 1500 on Expected Delivery Date - 1)	N/A
Transit Late Secondary Scan	There are no outgoing scans (any type, at origin facility) or Incoming Primary scans (at expected destination facility), and the First Incoming Secondary (at expected destination facility) scan is late (after 0700 on Expected Delivery Date)	There are no outgoing scans (any type, at origin facility) or Incoming Primary scans (at expected destination facility), and the First Incoming Secondary (at expected destination facility) scan is late (after 0700 on Expected Delivery Date)
Last Mile Failure	All Overall Failed Pieces that are not Processing failed pieces would be Last Mile failed	All pieces that passed First Mile + Processing, but failed Overall

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8. The total number of accidents for FY 2019 differ between the *FY 2020 Annual Report* (118,935) and the *FY 2019 Annual Report to Congress* (82,678).³ The Postal Service explains that "FY 2019 accident counts by type may differ from reported accident totals in previous *Annual Reports to Congress* due to either coding changes or additional claims being submitted after the end of the fiscal year." *FY 2020 Annual Report* at 42 n.2. Please explain in detail why the total number of accidents reported for FY 2019 increased by 36,257 in the *FY 2020 Annual Report*. In the response, please explain how coding changes affected the total number of accidents in FY 2019, and provide the number of additional claims submitted for FY 2019 after the end of FY 2019.

RESPONSE:

The apparent increase of 36,257 in the total number of accidents reported for FY 2019 in the *FY 2020 Annual Report* noted in the question is the result of an error made when creating the cited table in that document. As indicated in the first footnote to that table, figures for the third row, Motor Vehicle, are already reflected in the figures for the first two rows, and therefore the Total row should be merely the sum of the first two rows. Inadvertently, however, this year that format was not followed for this table. Instead, all three rows were included in the sum, and as a result, the Total row was overstated because of double-counting of the Motor Vehicle row. Had the correct format been employed, the Total row in table on page 42 of the *FY 2020 Annual Report* would have shown the following entries:

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	FY 2020	FY 2019	Percent Change
Total	80,902	90,008	(10.12)

Thus, instead of an observed increase of 36,257 (the difference between 82,678 and 118,935) for FY 2019 relative to the value for that year presented in the *FY 2019 Annual Report*, the observed increase would only have been 7,330 (the difference between 82,678 and 90,008).

There is no current ability to disaggregate that net increase of 7,330 between the number of additional claims versus the effects of recoding.

³ Compare FY 2020 Annual Report at 42 with *United States Postal Service FY 2019 Annual Report to Congress* at 27; see Docket No. ACR2019, Library Reference USPS-FY19-17, December 27, 2019.

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9. Please provide the total number of motor vehicle and non-motor vehicle accidents for FYs 2017 through 2020. If the numbers provided in the response differ from the numbers in past *Annual Reports to Congress*, please explain why.

RESPONSE:

Fiscal Year	MVA	Non-MVA	Total Accidents
2017	29,430	65,890	95,320
2018	30,026	64,519	94,545
2019	28,931	60,954	89,885
2020	26,190	55,535	81,725

The dynamic data base from which these current numbers for each year have been extracted is updated on an ongoing basis. Any net differences between these numbers and those found in past *Annual Reports to Congress* (drawn from the data base at previous points in time) reflect additions of late reported claims or coding corrections.

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- 10.** In the *FY 2020 Report*, the Postal Service states that in FY 2020 the Safety Dashboard platform “provided daily information on current performance levels and spotlighted areas of opportunity.” *Id.* at 41-42.
- a. Please describe in detail how the Safety Dashboard platform improved employee safety in FY 2020. In the response, please explain what daily information on current performance levels was provided, as well as how the Safety Dashboard platform spotlighted areas of opportunity.
 - b. Please describe other platforms and tools the Postal Service used in FY 2020 to improve employee safety and reduce the total number of accidents. In the response, please explain whether and how these platforms and tools were effective.

RESPONSE:

- a. The goal of the Safety Dashboard is to provide accurate and informative one-stop accident information that provides just-in-time data to support decision making at the facility, district, area and national levels.

The Overview Main page of the Safety Dashboard contains:

- NPA Cell data for Total Accident Rates
- Accident Counts by Type
- Accident Trends by Month with Forecast Projections

The Motor Vehicle Accident Tab provides data related to:

- Severity of Accident
- Direction of the Vehicle
- Vehicle Type
- Route Type

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- Employee Type
- MVA Accident Trends

The Industrial Accident Tab provides data related to:

- Severity of Accident
- Cause
- Employee type
- Accident Trends

At any level of the dashboard, local management and safety committees are able to upload and export summary accident data in order to assist in designing effective accident reduction plans for each facility.

b. In addition to the Safety Dashboard, the Postal Service utilized the Informed Mobility Safety Observation Tool (IMSOT). IMSOT is a mobile and web-based application that tracks safety observation requirements for each employee. The application alerts supervisors of upcoming safety observations required to be performed on the employee using the required standard timeframes outlined on the forms. It also reports on safety compliance and gaps for the targeted craft employee under District, Area, Post Office Operations Manager (POOM), and Facility. The reports are accessible to key management and safety analysts for process improvements and prevention programs to reduce injuries on the job. By observing each employee, the Postal Service is in a position to address and correct unsafe behavior before an accident occurs.

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The Postal Service also employs a Counseling at Risk Employee (CARE) tool that focuses discussions regarding safety concerns or training needs on employees with less than two years of service, employees with previous accidents and employees observed with unsafe behavior. This one-on-one conversation between employee and manager highlights opportunities for improving individual and office-wide safety performance and measures that can be taken to improve overall safety in the workplace.

Since the deployment and implementation of these tools and other safety awareness campaigns, training and stand-up talks, the Postal Service has seen a decrease in accidents.

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11. In a recent report, the Postal Service Office of Inspector General (OIG) evaluated employee safety measures the Postal Service implemented in response to the pandemic.⁴
- a. Please explain whether and how these safety measures improved employee safety and prevented or reduced the number of accidents in FY 2020.
 - b. In the report, the OIG recommended that the Postal Service clarify and communicate the Postal Service's face covering policy for consistent nationwide application, as well as evaluate options and implement a nationwide health screen initiative that may include employee self-certification. OIG Report at 2. The target date for implementing these recommendations was December 1, 2020. *Id.* at 14. Please explain whether and how the Postal Service implemented these recommendations in FY 2021.

RESPONSE:

a. The safety measures employed in response to the COVID-19 pandemic were designed to help protect employees both on the job and off the job and reflected current guidance offered by the Centers for Disease Control (CDC). COVID-19 has not had a direct impact on the number of accidents claimed in FY2020. For COVID-19 to be considered an accident claimed by our employees, they would need to document that the exposure was directly related to some aspect or circumstance of on-duty activities. The facts of the case must show an employment factor or requirement that gave rise to the resulting COVID-19 diagnosis. Although the Postal Service has had employees

⁴ United States Postal Service Office of Inspector General, *Employee Safety – Postal Service COVID-19 Response*, Report No. 20-259-R21, November 20, 2020 (OIG Report), available at <https://www.oversight.gov/sites/default/files/oig-reports/20-259-R21.pdf>.

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impacted by COVID-19, to date very few of these cases have been established as being the result of a work-related exposure.

b. On December 19, 2020, the Postal Service issued a letter to all managers and supervisors and various communications and guidance with requirements on the face covering policy and actions they can take regarding enforcement and corrective action for non-compliance with the face covering policy. This guidance reiterated the policy on social distancing and mask wearing along with guidance on when employees cannot or will not wear a face covering consistent with Postal Service policy. In addition, the Postal Service has issued Mandatory Stand-Up Talks for managers to give to all employees regarding the face covering policy, has published a Link article, and has scheduled ongoing communications planned for COVID-19 related topics. The OIG concurred with the action taken by Postal Service management and closed the recommendations.

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- 12.** In the *FY 2021 Plan*, the Postal Service states it will improve employee safety by “equipping local leaders with the tools and awareness training needed to maintain a culture of safety.” *FY 2020 Annual Report* at 42. Please describe the tools and awareness training that will help local leaders maintain a culture of safety.

RESPONSE:

Please see the response to Question 10 of this Information Request. By utilizing these tools to identify gaps in training or awareness, the Postal Service will continue to prevent accidents, increase partnerships between employees and managers and show a proactive approach to safety. Work has also begun on the development of a Safety and Health Management Tool that will be used to track hazards and incidents with a focus on root cause analysis, impact identification and action planning.

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- 13.** In the *FY 2021 Plan*, the Postal Service states it will “continue to leverage its delivery management systems, such as the Informed Mobility Safety Observation Tool” to improve employee safety and help reduce the number of motor vehicle accidents in FY 2021. *Id.* Please describe other delivery management systems, and explain how they will improve employee safety in FY 2021.

RESPONSE:

The Postal Service captures a great deal of information in various delivery management systems and enterprise analytics platforms that can be used to develop just in time safety programs and awareness campaigns. An example would be data indicating an increase in package volume that could drive new ergonomic tools for lifting and carrying or awareness campaigns showing how to properly load vehicles. Leveraging existing metrics and data tools collected by our operational partners to help identify safety needs or gaps will continue to afford the opportunity to prevent accidents before they occur.

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- 14.** In FY 2020, the Postal Pulse survey included a direct response comment box asking employees to provide feedback regarding positive changes seen in the workplace. *FY 2020 Annual Report* at 43.
- a. Please describe the positive changes identified in the comment boxes. In the response, please specify the most common positive changes employees saw in the workplace.
 - b. The Postal Service states that employee responses provided in the direct comment box were “aggregated to ensure confidentiality and shared with USPS leaders at all levels of the organization to directly influence workplace improvements.” *Id.* Please describe in detail how these comments were aggregated and shared with Postal Service leaders. In the response, please explain how these comments directly influenced workplace improvements, and provide examples of workplace improvements made.

RESPONSE:

- a. The positive changes identified in the comment box were analyzed and categorized. The most common positive changes occurred, in order of frequency, in the following categories: Good Manager or Supervisor; Good Teamwork and Collaboration; and More Care and Support.
- b. The overall comments from the Postal Pulse survey were broken down and analysis was provided to leadership within each of the nine functional areas and, also, the seven field areas. The report included guidance on using the report to create team strategies to improve team engagement.

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- 15.** In FY 2020, the Survey Response Rate declined from 38 percent to 33 percent. *Id.* at 42. The Postal Service points out that the survey took place during the pandemic, Political and Election Mail season, the re-alignment of core operations, and periods of high absenteeism, which “may have served as a detriment to the resources needed to execute the promotion and completion of the Postal Pulse employee survey.” *Id.* at 43.
- a. Please explain how each of these issues (the pandemic, Political and Election Mail season, the realignment of core operations, and periods of high absenteeism) contributed to a lower Survey Response Rate in FY 2020.
 - b. Please describe specific plans to improve the Survey Response Rate in FY 2021. In the response, please explain how the Postal Service will ensure it has the resources necessary “to execute the promotion and completion of the Postal Pulse employee survey” in FY 2021.

RESPONSE:

- a. The survey response rate declined from 38 percent to 33 percent for Postal Pulse 7. Postal Service employees are provided opportunities to take the survey while “on the clock.” While one cannot be sure of the exact impact on the response rate, it seems likely that higher absenteeism could mean that fewer employees were “on the clock” to participate. The pandemic and the impending election mail season may have distracted local units from strongly promoting participation in the survey. Lastly, with changes to the Postal Service organizational structure, there may have been increased ambiguity surrounding the survey questions that ask employees to rate their experience “at work.”
- b. The Postal Service has completed a national initiative to impact its next survey response rate. In February of 2021, the Postal Service had a national challenge to

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create team engagement plans. These team plans are designed to use the results of the feedback provided in survey 7 in a collaborative way. This timeline means that the Postal Service will be well prepared to connect supportive team engagement planning with participation in the survey, thus providing motivation to complete the survey.

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- 16.** To improve employee engagement in FY 2021, the Postal Service states it will support and expand the Next Level Connection process to “provide the necessary training and tools to all employee leaders to allow them to identify, assess and address engagement strengths and areas of opportunity specific to their local work environments.” *Id.* at 44. Please describe the Next Level Connection process and explain how it will provide employee leaders the necessary training and tools “to identify, assess and address engagement strengths and areas of opportunity specific to their local work environments.”

RESPONSE:

The Next Level Connection is an intentional conversation between a leader and a direct report. The purpose is to assess whether the employee can strongly agree that the 12 elements of engagement are present in the employee's work environment. If, by reviewing each of the 12 essential needs, the employee is unable to strongly agree with one or more, then the conversation should collaboratively address what actions to take to address the employee's needs.

It is through this conversation that lines of communication are opened, and it is through the fulfillment of the 12 elements that employee engagement is improved and/or sustained.

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17. To improve employee engagement in FY 2021, the Postal Service states that employees will use the Postal Service integrated human resources platform "HERO" to document critical conversations with employee leaders. *Id.* Please describe the HERO platform, and explain how the Postal Service will use this platform to improve employee engagement in FY 2021.

RESPONSE:

The HERO platform is an HR system that houses many HR programs and initiatives. The ability to track and document Next Level Connection conversations was installed in October of 2020. This national system allows the Postal Service to share updates to its usage, to analyze its usage and to promote convenience and tracking abilities, helping busy leaders ensure that these conversations happen consistently within their own teams.